

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GIDEON RAPAPORT,

Plaintiff,

- vs. -

ABIGAIL FINKELMAN,

Defendant.

No.: 1:24-cv-05942 (JGLC)

**NOTICE OF DEFENDANT ABIGAIL FINKELMAN'S MOTION  
FOR TEMPORARY RESTRAINING ORDER AND/OR  
PRELIMINARY INJUNCTION IMPOSING  
FILING INJUNCTION ON PLAINTIFF GIDEON RAPAPORT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant's Motion for a Temporary Restraining Order and/or Preliminary Injunction, the annexed Declaration of Max Rodriguez and the exhibits thereto, the Proposed Order, and all the pleadings and proceedings herein, Defendant Abigail Finkelman, by and through her undersigned counsel, hereby moves this Court before the Honorable Jessica G.L. Clarke, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, Room 1040, New York NY 10007, for an order, pursuant to Federal Rule of Civil Procedure 65(a) and (b), issuing a temporary restraining order and/or preliminary injunction enjoining Gideon Rapaport from filing any pleadings, motions, or other filings against or concerning Abigail Finkelman without prior leave of this Court. Defendant respectfully requests oral argument on this motion this afternoon after 2pm EST, or September 8, or, in the alternative, as soon as practicable for the Court.

Dated: September 5, 2025  
New York, New York

LAW OFFICE OF MAX RODRIGUEZ PLLC

By: /s/ Max Rodriguez

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